

Kramer Levin

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March 16, 2021

Via ECF

The Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

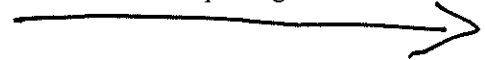
Re: United States v. Lewis et al., No. 20-CR-00234 (LAP)

Dear Judge Preska:

We represent the defendant Count Cooks in this matter and write on behalf of the parties with regard to scheduling. We understand that for logistical reasons it was not possible to hold the scheduled status conference today with the defendants present, by phone or otherwise. In light of this, the parties are in agreement that it would make sense to reschedule the conference for a date when the defendants can appear along with counsel.

Counsel for Mr. Cooks' co-defendants ask that the conference be set for a date in approximately three weeks. On behalf of our client, Mr. Cooks, we respectfully request that the conference be scheduled for a date as soon as practicable (which, we recognize, for logistical reasons, may effectively be in about three weeks). Mr. Cooks has not yet had the opportunity to appear before Your Honor since he was arrested and arraigned before the magistrate in September 2020, and would like to do so at the soonest possible date. We ask that he be permitted to appear by video conference, rather than by phone.

In the interim, we respectfully request that the Court set a schedule for pretrial motions. If the Court is agreeable to doing so, the parties propose that defense opening briefs be



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due by April 30, 2021; the government's opposition be due by May 28, 2021; and defense reply
briefs be due by June 11, 2021.

SO ORDERED

Loretta A. Preska

LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

3/17/21

Respectfully submitted,

/s/ Darren A. LaVerne

Darren A. LaVerne

Leah S. Friedman

Harry P. Morgenthau

cc: All Counsel of Record (*by ECF*)